

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SEVERO PASILLAS,	)	
	)	
Plaintiff,	)	08 C 1863
	)	
v.	)	Judge Kennelly
	)	
CITY OF CHICAGO, FRANK MICELI,	)	
Star #10297, and RAFAEL MARTINEZ,	)	Magistrate Judge Valdez
Star #15547,	)	
	)	
Defendants.	)	

**DEFENDANTS' AGREED MOTION TO EXTEND  
THE TIME IN WHICH TO ANSWER OR OTHERWISE PLEAD**

Defendants, the City of Chicago and Chicago Police Officers Frank Miceli and Rafael Martinez, by one of their attorneys, Kathryn M. Doi, Assistant Corporation Counsel, respectfully request this Honorable Court for an extension of time up to and including June 27, 2008 in which to answer or otherwise plead to Plaintiff's Complaint.

In support of this motion, Defendants state:

1. This matter was filed on April 1, 2008, naming the above-listed individual officers and the City as defendants.
2. Summons and Complaint have been served on the City and recently been personally served on both of the individual defendants.
3. The undersigned has not yet been able to interview the police personnel necessary to answer or otherwise plead to Plaintiff's Complaint.
4. The undersigned also has ordered, but has not yet received, any of the Chicago Police Department records to enable Defendants to properly respond to Plaintiff's Complaint.

5. This motion is Defendants' first request for an extension of time to answer or otherwise plead. Such a request will not unduly delay the resolution of the disputed issues, nor will it prejudice the plaintiff.

6. Plaintiff's counsel was informed of the content of this motion on June 2, 2008 and agrees with its terms.

**WHEREFORE**, Defendants respectfully request that they be given until June 27, 2008 to answer or otherwise plead to Plaintiff's Complaint.

Respectfully Submitted,

/s/ Kathryn M. Doi

KATHRYN M. DOI

Assistant Corporation Counsel

Suite 1400  
30 N. LaSalle Street  
Chicago, IL 60602  
(312) 744-0742  
Attorney No. 06274825